

Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,)	No. 2:25-cv-00244-LJK
)	
Plaintiffs,)	DECLARATION OF CLARENCE
)	HOLMES
vs.)	
)	
DONALD J. TRUMP, in his official capacity)	
as President of the United States, et al.,)	
)	
Defendants.)	
)	
)	

1 I, Clarence Holmes, hereby declare as follows:

2 1. I am an Assistant Member Program Director in the internal organizing department
3 of SEIU Healthcare 1199NW ("SEIU 1199NW"). I am over the age of 18, make this declaration
4 based on my personal knowledge, and if called as a witness could and would testify competently
5 to the following.

6 2. SEIU 1199NW has more than 37,000 members across Washington state working
7 in healthcare. Our members include registered nurses, licensed practical nurses, pharmacists,
8 technicians, professionals, therapists, mental health workers, certified nursing aides,
9 housekeeping and dietary staff, and other healthcare workers.

10 3. I have worked in organizing at SEIU 1199NW since March 2016. I am currently
11 an Assistant Member Program Director at SEIU 1199NW. My job duties include supporting
12 member leaders, union organizers and lead organizers in the day-to-day work of representing the
13 Union membership. In my role, I regularly interact with SEIU 1199NW's membership. I
14 frequently spend time engaging with the Union's membership, including many healthcare
15 professionals, about various aspects of their working conditions, including their concerns.

16 4. I am aware that, on January 28, 2025, President Trump signed an executive order
17 titled "Protecting Children from Chemical and Surgical Mutilation" ("Order"). I understand that
18 the Order threatens to withhold federal funding to hospitals and other medical entities that
19 provide gender-affirming care to patients under 19 years old. I also understand that the Order
20 directs the Department of Justice to prioritize enforcement of laws against female genital
21 mutilation, defines gender-affirming care as "chemical and surgical mutilation," and thus when
22 read as a whole appears to direct the federal government to criminally prosecute healthcare
23 providers who provide gender-affirming care.

24 5. Many of SEIU 1199NW's members directly provide gender-affirming care to
25 minors, and other members provide supportive care to minors who are receiving gender-
26 affirming care. Thousands of SEIU 1199NW members work for hospitals and other entities that
27 offer gender-affirming care to minors and that rely on federal funds and grants to operate and to

1 provide healthcare services to the general population. I have heard from many SEIU 1199NW
2 members that they are being harmed by, or face imminent harm from, the Order.

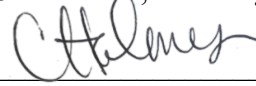
3 6. SEIU 1199NW members who provide gender-affirming care or support patients
4 receiving that care fear that they may be criminally prosecuted for providing these services. They
5 fear that the Order, unless it is enjoined, will require them to choose between facing federal
6 criminal prosecution or violating their ethical obligation to provide necessary care to their
7 patients. Many members feel that the Order puts them in an impossible position and requires
8 them to abandon their patients, some of whom they have been treating for years.

9 7. SEIU 1199NW members who provide gender-affirming care also worry that the
10 Order will cause irreparable injury to their patients. Members know that, if patients stop
11 receiving puberty-delaying medications or prescribed hormone treatments, transgender patients
12 will undergo immediate and irreparable changes to their bodies. Members also know that some
13 hospital systems in Washington and across the country have already halted gender-affirming
14 care, and that young transgender patients are likely already suffering irreparable harm to their
15 bodies stemming from the Order.

16 8. Many of our members, even those who do not directly provide gender-affirming
17 care, work at hospitals and other medical institutions that provide gender-affirming care and that
18 rely on federal funds and grants to stay open. These members fear that, if their employers
19 disobey the Order, their employers will lose critical federal funding, and that a loss of federal
20 funding will disrupt their employers' ability to offer a wide range of healthcare services to the
21 public and potentially affect members' personal employment and livelihood.

22 9. Some of our members also have family members who are transgender or gender
23 fluid youth who receive gender-affirming care. These members fear that their family members
24 will lose access to critical medical care if the Order is not enjoined.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 12th day of February 2025 in Seattle, Washington.

3 

4 Clarence Holmes